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Party Defendant* NATIONAL FIRE &  
MARINE INSURANCE COMPANY

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

UNITED NATIONAL INSURANCE COMPANY,  
licensed to do business in the State of Nevada,

Plaintiff,

vs.

ASSURANCE COMPANY OF AMERICA, licensed  
to do business in the State of Nevada and  
MARYLAND CASUALTY COMPANY, licensed to  
do business in the State of Nevada,

Defendants.

And all related claims.

Docket No. 2:10-CV-01086-JAD-NJK

**STIPULATION AND PROPOSED SCHEDULING ORDER**

On January 29, 2014, the Court issued a Scheduling Order [ECF No. 148] setting dates for the remaining deadlines in this case. Due to unexpected scheduling complications, the Parties<sup>1</sup> submit the following stipulation and proposed scheduling Order:

<sup>1</sup> Defendants/Counterclaimants/Third Party Plaintiffs Assurance Company of America (“Assurance”) and Maryland Casualty Company (“Maryland”) (jointly, the “Zurich Parties”), Plaintiff/Counterdefendant United National Insurance Company (“United”), and Counterdefendant/Third Party Defendant National Fire & Marine Insurance Company (“National Fire”) (collectively, the “Parties”).

1 1. On January 29, 2014, the Court's issued a Scheduling Order [ECF No. 148] that  
 2 included the following dates:

3 a. Discovery

4 i. Derchi Deposition: February 27, 2014

5 ii. Last Day for Zurich to re-file its Motion to March 11, 2014  
 6 Compel [ECF No. 137]:

7 iii. Last Day For National Fire to file a Response March 31, 2014  
 8 to Zurich's Motion to Compel [ECF No. 137]:

9 iv. Last Day for Zurich to File a Reply to Zurich's April 14, 2014  
 10 Motion to Compel [ECF No. 137]:

11 b. Dispositive Motions

12 i. Last Day to File Dispositive Motions: March 28, 2014

13 ii. Last Day to File Responses to Dispositive April 28, 2014  
 14 Motions:

15 iii. Last Day to File Replies to Dispositive May 26, 2014  
 16 Motions:

17 c. Last Day to Submit Joint Pre-Trial Order: June 30, 2014 or 30 days  
 18 after the Court decides all  
 19 dispositive motions,  
 20 whichever is later

21 d. Proposed Trial Date: 60 days after the entry  
 22 Joint Pre-Trial Order

23 Estimated length of Trial: 5-10 judicial  
 24 days.  
 25

26 2. On February 24, 2014, counsel for National Fire informed counsel for the Zurich  
 27 Parties and United that its lead attorney, Ms. Harmon, was ill.

28 3. On February 25, 2014, counsel for National Fire further informed the parties that Ms.  
 29 Harmon was not anticipated to return to work prior to the February 27, 2014 deposition of  
 30 Robert Derchi, who will depose in his individual capacity and as the F.R.C.P. 30(b)(6)  
 31 corporate representative for Assurance and Maryland.

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1 4. To accommodate Ms. Harmon's illness, the Zurich Parties and United have agreed to  
 2 continue the deposition of Mr. Derchi to March 21, 2014, which is the first date that deponent  
 3 and all counsel are available.

4 5. The Parties further agreed that the extension would require that the dates for the  
 5 remaining deadlines be extended accordingly.

6 6. The Parties further propose the following dates for the remainder of this case:

7 a. Discovery

8 i. Derchi Deposition: March 21, 2014

9 ii. Last Day for Zurich to re-file its Motion to April 11, 2014  
 10 Compel [ECF No. 137]:

11 iii. Last Day For National Fire to file a Response April 28, 2014  
 12 to Zurich's Motion to Compel [ECF No. 137]:

13 iv. Last Day for Zurich to File a Reply to Zurich's May 8, 2014  
 14 Motion to Compel [ECF No. 137]:

15 b. Dispositive Motions

16 i. Last Day to File Dispositive Motions: April 18, 2014

17 ii. Last Day to File Responses to Dispositive May 19, 2014  
 18 Motions:

19 iii. Last Day to File Replies to Dispositive June 19, 2014  
 20 Motions:

21 c. Last Day to Submit Joint Pre-Trial Order: July 31, 2014 or 30 days  
 22 after the Court decides all  
 23 dispositive motions,  
 24 whichever is later  
 25  
 26  
 27

d. Proposed Trial Date:

60 days after the entry  
Joint Pre-Trial Order

Estimated length of Trial: 5-10 judicial  
days.

DATED: February 26, 2014      DATED: February 26, 2014      DATED: February 26, 2014

MORALES, FIERRO & REEVES

CHRISTIAN, KRAVITZ,  
DICTER, JOHNSON & SLUGA

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By: /s/ Ramiro Morales  
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Respectfully Submitted by:  
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**IT IS SO ORDERED .**

DATED this 27 day of February, 2014.

  
UNITED STATES MAGISTRATE JUDGE